

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION**

<b>Sara C. Roseborough,</b>	)	<b>Case No.:</b>	<u>0:21-cv-00081-MGL</u>
	)		
	)		
	)		
<b>Plaintiff,</b>	)		
	)		
	)		
<b>v.</b>	)		
	)		
	)		
<b>Target Corporation,</b>	)		<b>NOTICE OF REMOVAL</b>
	)		
	)		
	)		
<b>Defendant.</b>	)		

**TO: THE UNITED STATES DISTRICT COURT:**

Defendant, Target Corporation, would respectfully show the Court in support of its Notice of Removal that:

1. The Summons and Complaint in this action were filed on December 7, 2020 in the Court of Common Pleas for York County, South Carolina. Attached for the Court are copies of Plaintiff's Summons and Complaint. The Complaint is the first pleading served upon the Defendant in this action and service was affected on December 10, 2020. Therefore, removal is timely under 28 U.S.C. §1446(b).

2. The United States District Court has jurisdiction over this action pursuant to 28 U.S.C. §1332. The Plaintiff is a resident of the State of South Carolina and Defendant Target Corporation is incorporated in the State of Minnesota and has its principle place of business in the State of Minnesota. The action has been brought by the Plaintiff against the Defendant for the alleged accident which occurred in Charlotte, North Carolina.

3. Venue is proper in this matter in the Rock Hill Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Plaintiff alleges in the Prayer for Relief of her Summons and Complaint, that the amount in controversy in this matter exceeds \$100,000.00 for actual, consequential, special and punitive damages.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for York County.

Respectfully submitted,

**SWEENEY, WINGATE & BARROW, P.A.**

s/ Mark S. Barrow  
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**ATTORNEYS FOR THE DEFENDANT**

Columbia, South Carolina

January 8, 2021